

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
BRUNSWICK DIVISION**

STATE OF MISSOURI,
STATE OF GEORGIA,
STATE OF ALABAMA
STATE OF ARKANSAS,
STATE OF FLORIDA,
STATE OF NORTH DAKOTA, and
STATE OF OHIO

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
EDUCATION,

MIGUEL A. CARDONA, in his official
capacity as Secretary, United States
Department of Education, and

JOSEPH R. BIDEN, Jr., in his official
capacity as President of the United States,

Defendants.

2:24-cv-00103-LGW-BWC
Civil Action No. _____

**EMERGENCY TRO requested
immediately, but no later than
September 6, 2024**

**NOTICE REQUESTING HEARING ON
MOTION FOR TEMPORARY RESTRAINING ORDER**

Plaintiff States hereby request a hearing on their motion for a temporary restraining order any time between now and Friday, September 6, 2024, or as soon thereafter as may be heard. To avoid logistical difficulties of last-minute travel, Plaintiff States request video or teleconference if possible. Because counsel for Missouri is most familiar with the arguments, Plaintiff States also request that the Court promptly rule on Missouri counsel's pro hac applications, which are being filed concurrently with this motion.

Plaintiff States have alerted Defendants of their complaint, this request for a hearing, and the combined motion for stay/preliminary injunction/temporary restraining order. On September

3, 2024, shortly after the complaint and brief were filed, Plaintiffs' counsel Joshua Divine sent an email to Stephen M. Pezzi (Stephen.Pezzi@usdoj.gov) and Simon G. Jerome (Simon.G.Jerome@usdoj.gov) at the United States Department of Justice, Civil Division. Mr. Pezzi and Mr. Jerome are counsel of record for the same Defendants in the second mass cancellation challenge in the United States District Court for the Eastern District of Missouri. That email included a copy of the complaint in this action, the accompanying exhibits, the combined motion for stay/preliminary injunction/temporary restraining order, and a copy of this motion.

Date: September 3, 2024

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Respectfully Submitted,

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